

1 THE HONORABLE DAVID G. ESTUDILLO  
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 5

6 UNITED STATES DISTRICT COURT  
 7 WESTERN DISTRICT OF WASHINGTON

8 AARON WILLIAMS, on behalf of himself and all  
 9 others similarly situated,

10 Plaintiff,

11 vs.

12 PILLPACK LLC,

13 Defendant.

14 Case No. 3:19-cv-05282-DGE

15 **DECLARATION OF ANTHONY PARONICH  
 16 IN SUPPORT OF PLAINTIFF'S MOTION  
 17 FOR ATTORNEYS' FEES, COSTS, AND  
 18 SERVICE AWARD**

19 I, Anthony Paronich, hereby declare as follows:

20 1. I am over 18 years of age, I make this declaration based on my own personal  
 21 knowledge, and I am competent to testify to the facts in this declaration.

22 **A. Background and experience**

23 2. I am an attorney duly admitted to practice in the Commonwealth of  
 24 Massachusetts, I am over 18 years of age, and I am competent to testify and make this affidavit  
 25 on personal knowledge. I have extensive experience in the prosecution of class actions on  
 26 behalf of consumers, particularly claims under the TCPA.

27 3. I am a 2010 graduate of Suffolk Law School. In 2010, I was admitted to the Bar in  
 28 Massachusetts. Since then, I have been admitted to practice before the Federal District Court  
 29 for the District of Massachusetts, the Northern District of Illinois, the Eastern District of  
 30 Michigan, the Western District of Wisconsin, the Southern District of Indiana, the First Circuit  
 31

32 DECLARATION OF ANTHONY PARONICH IN SUPPORT OF  
 33 PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE  
 34 AWARD - 1

35 Case No. 3:19-cv-05282-DGE

TERRELL MARSHALL LAW GROUP PLLC  
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1 Court of Appeals, the Seventh Circuit Court of Appeals, and the Ninth Circuit Court of Appeals.  
 2 From time to time, I have appeared in other State and Federal District Courts *pro hac vice*. I am  
 3 in good standing in every court to which I am admitted to practice.

4       4. I was an associate at Broderick Law, P.C. in Boston, Massachusetts from 2010  
 5 through 2016.

6       5. I was a partner at Broderick & Paronich, P.C. in Boston, Massachusetts from 2016  
 7 through 2019.

8       6. In 2019, I started Paronich Law, P.C., focused on protecting consumers in class  
 9 action lawsuits.

10      7. I have been appointed class counsel in more than 50 TCPA cases, including the  
 11 following:

- 12       i. Desai and Charvat v. ADT Security Services, Inc., USDC, N.D. Ill., 11-CV-1925, a  
 13           TCPA class settlement of \$15,000,000 granted final approval on June 21, 2013.
- 14       ii. Jay Clogg Realty Group, Inc. v. Burger King Corporation, USDC, D. Md., 13-cv-  
 15           00662, a TCPA class settlement of \$8,500,000 granted final approval on April 15,  
 16           2015.
- 17       iii. Charvat v. AEP Energy, Inc., USDC, N.D. Ill., 1:14-cv-03121, a TCPA class  
 18           settlement of \$6,000,000 granted final approval on September 28, 2015.
- 19       iv. Bull v. US Coachways, Inc., USDC, N.D. Ill., 1:14-cv-05789, a TCPA class  
 20           settlement finally approved on November 11, 2016 with an agreement for  
 21           judgment in the amount of \$49,932,375 and an assignment of rights against  
 22           defendant's insurance carrier.
- 23       v. Smith v. State Farm Mut. Auto. Ins. Co., et. al., USDC, N.D. Ill., 1:13-cv-02018, a  
 24           TCPA class settlement of \$7,000,000.00 granted final approval on December 8,  
 25           2016.
- 26       vi. Mey v. Frontier Communications Corporation, USDC, D. Conn., 3:13-cv-1191-  
 27           MPS, a TCPA class settlement of \$11,000,000 granted final approval on June 2,  
 28           2017.
- 29       vii. Heidarpour v. Central Payment Co., USDC, M.D. Ga., 15-cv-139, a TCPA class  
 30           settlement of \$6,500,000 granted final approval on May 4, 2017.

31           DECLARATION OF ANTHONY PARONICH IN SUPPORT OF  
 32           PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE  
 33           AWARD - 2  
 34           Case No. 3:19-cv-05282-DGE

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- 1                   viii. Abante Rooter and Plumbing, Inc. v. Birch Communications, Inc., USDC, N.D. Ga.,  
 2                   1:15-CV-03562-AT, a TCPA class settlement of \$12,000,000 granted final  
 3                   approval on December 14, 2017.
- 4                   ix. Abante Rooter and Plumbing, Inc. v. Pivotal Payments, Inc., USDC, N.D. Ca., 3:16-  
 5                   cv-05486-JCS, a TCPA class settlement of \$9,000,000 granted final approval on  
 6                   October 15, 2018.
- 7                   x. In re Monitronics International, Inc., USDC, N.D.W. Va., 1:13-md-02493-JPB-JES,  
 8                   a TCPA class settlement of \$28,000,000 granted final approval on June 12,  
 9                   2018.
- 10                  xi. Thomas Krakauer v. Dish Network, L.L.C., USDC, M.D.N.C., 1:14-CV-333 on  
 11                  September 9, 2015. Following a contested class certification motion, this case  
 12                  went to trial in January of 2017 returning a verdict of \$20,446,400. On May 22,  
 13                  2017, this amount was trebled by the Court after finding that Dish Network's  
 14                  violations were "willful or knowing", for a revised damages award of  
 15                  \$61,339,200. (Dkt. No. 338). The Fourth Circuit Court of Appeals unanimously  
 16                  affirmed the judgment in May of 2019. *Krakauer v. Dish Network, L.L.C.*, 925 F.3d  
 17                  643 (4th Cir. 2019). The United States Supreme Court rejected *certiorari* of this  
 18                  matter in December of 2019. See *DISH Network L.L.C. v. Krakauer*, 140 S. Ct. 676  
 19                  (2019).
- 20                  xii. Charvat v. Carnival Corporation & PLC, et. al., USDC, ND. Ill., 1:13-cv-00042, a  
 21                  TCPA class settlement of \$12,500,000 granted final approval in April of 2020.
- 22                  xiii. Loftus v. Sunrun, Inc., USDC, N.D. Ca., 3:19-cv-1608, a TCPA class settlement of  
 23                  \$5,500,000 granted final approval on May 11, 2021.
- 24                  xiv. Andrew Perrong v. Orbit Energy & Power, LLC, USDC, E.D. PA., Civil  
 25                  Action No. No. 2:21-cv-777. A class settlement of **\$6,000,000** granted final  
 26                  approval on June 21, 2022.
- 27                  xv. David Vance, et. al. v. DirecTV, LLC, USDC, N.D. WV., Civil Action No. 5:17-  
 28                  cv-179. A class settlement of **\$16,850,000** granted final approval on  
 29                  August 24, 2023.
- 30                  xvi. Berman v. Freedom Financial Network, LLC et al., N.D. CA., Civil Action  
 31                  No. 18-cv-1060. A class action settlement of **\$9,750,000** granted final  
 32                  approval on February 23, 2024
- 33                  xvii. Murray v. Grocery Delivery E-Services USA, Inc. D. MA. Civil Action No.  
 34                  19-cv-12608. A class action settlement of **\$11,000,000** granted final  
 35                  approval on March 13, 2024.

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1      **B. Paronich Law's lodestar and litigation costs**

2            8. Paronich Law has devoted over 750 hours to litigating this matter since August  
 3 2019, working with no guarantee of being compensated for its time and efforts. Payment of the  
 4 firm's fees has been contingent on successfully obtaining relief for the plaintiff and class  
 5 members. As a result, there was a substantial risk of non-payment, particularly in light of the  
 6 challenges inherent in this type of case. Work on this case has necessarily been to the exclusion  
 7 of work on other matters that likely would have generated fees. Paronich Law has also been  
 8 denied use of the fees it earned over the course of this case.

9            9. A document that compiles the contemporaneously maintained billing records for  
 10 Paronich Law is attached as **Exhibit 1**. I have reviewed these billing records and reduced and  
 11 eliminated time that was administrative in nature, or that appeared to be redundant or  
 12 inefficient. It is my firm belief that the time billed was reasonably necessary to litigate this case  
 13 and secure a settlement on behalf of the plaintiff and the class. I have also estimated 28 hours  
 14 to travel to and attend the final approval hearing as well as time spent working with the third-  
 15 party administrator administer the settlement.

16            10. Paronich Law has incurred out-of-pocket litigation expenses totaling \$68,884.67  
 17 primarily to cover expenses related to expert witnesses, local counsel fees for an enforcement  
 18 action, forensic costs and service of subpoenas. The following chart summarizes Paronich Law's  
 19 litigation costs:

Category of Expense	Total
Service of Subpoenas	968.75
Expert Costs	\$33,932
Forensic Analysis Costs	\$19,273.46
Deposition Transcripts	\$7,543.46
Travel (Air Fare, Hotel, Meals)	\$5,827

Category of Expense	Total
Local Counsel for Enforcement Action	\$1,340
<b>TOTAL</b>	<b>\$68,884.67</b>

I declare under penalty of perjury under the laws of the State of Washington that  
foregoing is true and correct.

EXECUTED at Hingham, Massachusetts this 19<sup>th</sup> day of November, 2024.

/s/ Anthony I. Paronich

Anthony I. Paronich, Admitted Pro Hac Vice